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Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA :

CRIMINAL NO. **4:24-cr-00224**

v. :

UNDER SEAL

ENRIQUE ROBERTO "HENRY" :

CUELLAR, :

and :

IMELDA RIOS CUELLAR, :

Defendants. :

MOTION TO SEAL INDICTMENT AND ORDER

The United States moves for an Order to seal the above-captioned indictment, order, and notice pertaining to the above Defendants.

The United States respectfully requests that this indictment be filed under seal. It is further requested that it be unsealed as to a particular defendant when that defendant is taken into custody or shows for an initial appearance.

The United States further requests that this Order permit the Clerk's office to provide a copy of the sealed indictment to the United States and that the United States, notwithstanding the sealing, be permitted to produce these documents to any defendant and his counsel, and to any state, local, federal, and foreign law enforcement agency assisting with, or working on this matter and related matters, to comply with its discovery obligations, to continue investigation of other potential charges in this matter, and to assist in the apprehension of any defendant.

Respectfully submitted,

COREY R. AMUNDSON
Chief, Public Integrity Section
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U.S. Department of Justice

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